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Attorneys for Defendant
JOSÉ LUIS HUIZAR

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSÉ LUIS HUIZAR,

Defendant.

Case No. 20-CR-326-JFW-1

**UNOPPOSED *EX PARTE*
APPLICATION FOR ORDER TO
ALLOW INTERNATIONAL
TRAVEL AND TEMPORARY
MODIFICATION OF BOND
CONDITIONS; DECLARATION OF
COUNSEL**

Defendant José Luis Huizar, through his attorneys of record, Deputy Federal Public Defenders Carel Alé, Charles Snyder, and Adam Olin, seeks an order temporarily modifying the conditions of release to allow him to travel internationally for 10 days. The purpose is for Mr. Huizar to attend religious ceremonies in Zacatecas, Mexico, that are important to his Catholic faith. Mr. Huizar seeks the temporary modification of the conditions of his bond as further explained below.

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1 The United States Pretrial Services Office and the government do not oppose this
2 request.

3 Respectfully submitted,

4 CUAUHTÉMOC ORTEGA
5 Federal Public Defender

6 DATE: August 16, 2021

7 By /s/ Carel Alé

8 CAREL ALÉ
9 Deputy Federal Public Defender
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DECLARATION OF CAREL ALÉ

I, Carel Alé, hereby state and declare as follows:

1. I am a Deputy Federal Public Defender in the Central District of California appointed to represent José Luis Huizar in the above-entitled action.

2. Mr. Huizar travels annually to his hometown in Zacatecas, Mexico to worship at three religious sites important to his Catholic faith.

3. Mr. Huizar's mother, Isidra Huizar, and sister, Gloria Galvan, plan to travel to Zacatecas, Mexico in late August or early September to visit these religious sites. Mr. Huizar would like to complete his annual pilgrimage to these sites along with his mother and sister. His expenses would be paid by his mother.

4. Mr. Huizar has been on pretrial release since June 23, 2020. (ECF No. 6.)

5. Trial is currently set for May 24, 2022. (ECF No. 187.)

6. Mr. Huizar's bond conditions restrict his travel to the Central District of California. (ECF No. 14.)

7. Mr. Huizar surrendered his passport to U.S. Pretrial Services on June 23, 2020. (ECF No. 13.)

8. Mr. Huizar seeks permission to temporarily modify the conditions of his pretrial release to allow him to travel to Mexico to visit religious sites where he attends annual religious ceremonies.

9. Mr. Huizar's sister, Ms. Galvan, is willing to take third-party custody of Mr. Huizar during the trip and execute an Affidavit of Third-Party Custodian, CR-31 form. I have discussed with her the responsibilities of being a third-party custodian and believe she understands those responsibilities.

10. On August 10, 2021, I spoke with Pretrial Services Officer Erika Pimentel to obtain her position on this request. Officer Pimentel advised me that Mr. Huizar is in compliance with the conditions of his pretrial release and that U.S. Pretrial Services does not oppose this request.

1 11. Officer Pimentel also advised that if the Court authorized Mr. Huizar to
2 obtain and be in possession of his passport, Mr. Huizar should be ordered to surrender
3 the passport to U.S. Pretrial Services within 24 hours of his return.

4 12. On August 10, 2021, I spoke with Assistant United States Attorney Mack
5 Jenkins about this request.

6 13. On August 13, 2021, AUSA Jenkins advised that he spoke with Ms. Galvan
7 and was satisfied that she understood and accepted her responsibilities as a third-party
8 custodian. The government also advised that it did not oppose this request with the
9 addition of a condition requiring the Huizar children's passports to be surrendered to
10 defense counsel prior to and during the time of Mr. Huizar's travels.

11 14. Accordingly, Mr. Huizar proposes the following temporary modifications
12 to the conditions of his bond to allow him to travel internationally:

- 13 (a) Removal of the condition restricting travel to the Central District of
14 California;
- 15 (b) Additional condition allowing Mr. Huizar to obtain his passport from U.S.
16 Pretrial Services and requiring him to re-surrender it to U.S. Pretrial
17 Services within 24 hours of his return;
- 18 (c) Additional condition allowing Mr. Huizar to travel internationally,
19 specifically to Mexico, for ten days;
- 20 (d) Additional condition requiring Mr. Huizar's sister, Gloria Galvan, to take
21 third-party custody of Mr. Huizar during the time Mr. Huizar is outside of
22 the Central District of California, and to execute and file an Affidavit of
23 Third-Party Custody, CR-31 form; and

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1 (e) Additional condition requiring Mr. Huizar to surrender his children's
2 passports to defense counsel prior to any travel.
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4 I declare under penalty of perjury of the laws of the United States of America that
5 the foregoing is true and correct to the best of my knowledge.
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7 DATED: August 16, 2021

/s/ Carel Alé

8 CAREL ALÉ
9 Deputy Federal Public Defender
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